

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

LM INSURANCE CORPORATION

PLAINTIFF

VS.

CAUSE NO. 3:17-CV-735 CWR-FKB

**LACEY HUDDLESTON, JONATHAN HUDDLESTON
AND PENELOPE COOPER**

DEFENDANTS

UNCONTESTED MOTION TO AMEND THE CASE MANAGEMENT ORDER

COMES NOW, Defendant Penelope Cooper, by and through counsel to file this *Uncontested Motion to Amend the Case Management Order [Docket 10]*, and in support thereof would show unto the Court the following:

1. Counsel for the parties have worked in good faith to conduct discovery in this matter. However, discovery disputes have occurred which necessitated a discovery conference with the Court and entry of a protective order.

2. Due to scheduling conflicts, the depositions of Lacey Huddleston and Jonathan Huddleston have not occurred. In addition, the Huddlestons have not answered the written discovery propounded to them by Defendant Cooper.

3. Pursuant to the Case Management Order [Docket 10], a settlement conference is scheduled for August 7, 2018 before Magistrate Keith Ball. Pursuant to a “text only” Order from the Court dated June 11, 2018, the current discovery deadline for this matter is August 3, 2018.

4. According to counsel for the Huddlestons, they are not available for depositions until mid-August.

5. Until the Huddlestons fully answer discovery and their depositions are conducted, Defendant Cooper will not be able to meaningfully participate in the settlement conference currently scheduled for August 7, 2018.

6. Counsel for Defendant Cooper would respectfully request that the discovery deadline for this matter be amended to allow an additional sixty (60) days to conclude discovery and that the Court schedule the settlement conference thereafter.

7. Counsel for Defendant Cooper has discussed this matter with counsel opposite and no party objects to amendment of the case management order.

WHEREFORE, PREMISES CONSIDERED, Defendant Penelope Cooper respectfully request the Court to grant her *Uncontested Motion to Amend the Case Management Order* to allow an additional sixty (60) days to conduct discovery and reschedule the settlement conference currently scheduled for August 7, 2018.

Respectfully submitted this the 26th day of July, 2018.

Respectfully submitted,

Defendant Penelope Cooper

By: Robert Boyd and Associates PLLC

By: s/ Randy Wallace
Randy Wallace (MSB 99889)

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CERTIFICATE OF SERVICE

I hereby certify that on July 26, 2018, I electronically filed the foregoing document with the Clerk of the Court using the ECF system which sent notification of such filing to all counsel who have electronically registered with the Court, and I hereby certify that I have mailed by United States Postal Service and/or emailed the document to non-ECF participants.

/s/ Randy Wallace

Randy Wallace